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ERFAN "ERIC" AMIDI ON BEHALF OF  
HIMSELF AND ALL OTHERS SIMILARLY-  
SITUATED

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Attorneys for Defendants  
SBC LONG DISTANCE, LLC and  
AT&T OPERATIONS, INC.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

ERFAN "ERIC" AMIDI, on behalf  
of himself and all others similarly-  
situated,

Plaintiffs,

vs.

SBC LONG DISTANCE, LLC, a  
Delaware Corporation, AT&T  
OPERATIONS, INC., a Delaware  
Corporation, and DOES 1 through  
100, Inclusive,

Defendants.

CASE NO. 08CV0858 WQH (WMc)

**JOINT MOTION TO CONTINUE  
THE EARLY NEUTRAL  
EVALUATION CONFERENCE**

Judge: William Q. Hayes  
Magistrate: William McCurine, Jr.

Class Action Complaint Filed:  
May 13, 2008

1 Plaintiff Erfan Amidi ("Plaintiff") and defendants SBC Long Distance,  
2 LLC and AT&T Operations, Inc. ("Defendants"), by and through counsel of record,  
3 respectfully request that the United States Magistrate Judge of the United States  
4 District Court of the Southern District of California, William McCurine, Jr.,  
5 reschedule the Early Neutral Evaluation conference in the matter captioned above  
6 set for August 4, 2008, at 9:30 a.m., to a date at least sixty days thereafter, on a date  
7 convenient for the Court.

8  
9 Good cause for the request exists in that this case is a purported class  
10 action on behalf of a class of persons who worked for Defendants in California in  
11 various Information Technology (IT) positions and were allegedly misclassified as  
12 exempt from overtime laws. Defendants were served with Plaintiff's First  
13 Amended Complaint in this matter and filed their Answer in June. The parties need  
14 time to investigate the claims, particularly with respect to the scope of the purported  
15 class Plaintiff seeks to represent. The parties agree that it will not be possible at  
16 this stage to assess the possible settlement value of the case. They will be in a  
17 better position to comply with the Court's Order requiring that they be "legally and  
18 factually prepared to discuss and resolve the case at the Early Neutral Evaluation  
19 conference" if the Early Neutral Evaluation conference is continued to a date in  
20 October 2008.

21  
22 THEREFORE, IT IS HEREBY STIPULATED by and between  
23 Plaintiff Erfan Amidi, by and through his counsel of record, Timothy D. Cohelan  
24 and Cohelan & Khoury, and Defendants SBC Long Distance, LLC and AT&T  
25 Operations, Inc., by and through their counsel of record, J. Al Latham, Jr. and Paul,  
26 Hastings, Janofsky & Walker LLP, that the date for conducting the Early Neutral  
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1 Evaluation Conference be extended and continued by sixty (60) days from  
2 August 4, 2008, to a date convenient for the Court.  
3

4 DATED: July 10, 2008

TIMOTHY D. COHELAN  
ISAM C. KHOURY  
MICHAEL D. SINGER  
COHELAN & KHOURY

7  
8 By: s/Timothy D. Cohelan  
TIMOTHY D. COHELAN

9  
10 Attorneys for Plaintiff  
ERFAN "ERIC" AMIDI ON BEHALF OF  
11 HIMSELF AND ALL OTHERS SIMILARLY-  
SITUATED  
12  
13

14 DATED: July 11, 2008

J. AL LATHAM, JR.  
DEBORAH S. WEISER  
PAUL, HASTINGS, JANOFSKY & WALKER LLP

16  
17 By: /s/ J. Al Latham, Jr.  
J. AL LATHAM, JR.

18 Attorneys for Defendants  
19 SBC LONG DISTANCE, LLC and  
AT&T OPERATIONS, INC.  
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**PROOF OF SERVICE**

I am employed in the City and County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Paul, Hastings, Janofsky & Walker LLP, 515 S. Flower Street, 25th Floor, Los Angeles, California 90071.

On July 11, 2008, I served:

**JOINT MOTION TO CONTINUE THE EARLY NEUTRAL  
EVALUATION CONFERENCE**

on the party(ies) in this action by placing a true copy thereof in a sealed envelope(s), addressed as follows:

**See Attached Service List**

☒ (BY E-FILE) I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel denoted on the attached Service List, and I hereby certify that I have mailed the foregoing document(s) via the United States Postal Service to the non-CM/ECF participants indicated on the attached Service List.

☒ (BY MAIL) I placed each such sealed envelope, with postage thereon fully prepaid for first-class mail, for collection and mailing at Paul, Hastings, Janofsky & Walker LLP, Los Angeles, California, following ordinary business practices. I am familiar with the practice of Paul, Hastings, Janofsky & Walker LLP for collection and processing of correspondence, said practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.

☐ (BY PERSONAL DELIVERY) I then sealed the envelope and caused it to be hand delivered to the offices of the addressee(s) below.

☐ (BY UNITED PARCEL SERVICE) I am readily familiar with the practice of Paul, Hastings, Janofsky & Walker LLP for collection and processing of correspondence for overnight delivery and know that the document(s) described herein will be deposited in a box or other facility regularly maintained by United Parcel Service for overnight delivery.

☒ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court, at whose direction this service was made.

Executed at Los Angeles, California on July 11, 2008.

  
FRANCINE SHELDON

**SERVICE LIST**

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\*Sent via E-file

\*\*Sent via U.S. mail

CASE NO. 08CV0858 WQH (WMC)

LEGAL US W # 59240127.1